

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

STEELCASE, INC. a Michigan
corporation,

Plaintiff,

Case No.: 1:04cv0026
Hon. Robert Holmes Bell

v.

Chief, U. S. District Judge

HARBIN'S INC., an Alabama
corporation, MICHAEL G. HARBIN
and HOPE D. HARBIN PATTERSON (now
HOPE DUNCAN PATTERSON),

Defendants.

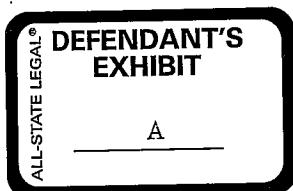
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CUMMISKEY, P. L. C.
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**AFFIDAVIT IN SUPPORT OF DEFENDANT MICHAEL G. HARBIN'S
MOTION FOR CHANGE OF VENUE, OR ALTERNATIVELY, TO ADJOURN
THE TRIAL AND SETTLEMENT CONFERENCE**

Defendant Michael G. Harbin ("Harbin") deposes and says as follows:

1. I am the defendant in the above captioned case.
2. If called upon to testify, I can testify truthfully and accurately as to all those matters contained herein.



3. Defendant Harbin's, Inc. ("Harbin's") went out of business in April of 2004. At the time that Harbin's went out of business, I had no other source of income.

4. After April of 2004 I moved to Santa Rosa Beach, Florida where I began work as a real estate sales person.

5. In my Brief in Support of Motion for Change of Venue, or Alternatively, to Adjourn the Trial and Settlement Conference ("Venue Motion") my attorney listed a possible¹⁷ additional witnesses which I would like to call in my defense at the trial of this matter. One of those witnesses is my wife Courtney Harbin who also lives in Florida. Of the remaining 16 witnesses, 13 of them are located in Montgomery, Alabama; one in Birmingham, Alabama; one in Tennessee, and another in Florida. The only witness listed in my proposed Pretrial Order, who will testify regarding the piercing the corporate veil claim, was my wife Courtney Harbin. The other witnesses were not listed because I cannot afford their travel expenses to Michigan. I cannot afford to pay my attorney in Michigan to travel to Alabama, Florida, and Tennessee to take the depositions of the other witnesses, nor can I afford the expense of their individual transcripts.

6. If venue is changed to the Middle District of Alabama, I will retain local counsel who will be able to interview the witnesses in person so that I may determine which of them I want to call to testify at trial.

7. Several of the witnesses I may want to call are bankers and lawyers. It may well be difficult to get them to testify without a subpoena.

8. I do not have the financial resources to defend the claim against me in the manner which my attorney recommends. If the case is moved to the Middle District of Alabama, I will be far more able to afford an adequate defense.

9. Further your affiant sayeth not.

Dated: 8/31/2005



Michael G. Harbin

STATE OF FLORIDA)
>
WALTON COUNTY).

SUBSCRIBED and SWORN to before me, a Notary Public, on this 31st day of
August, 2005, before Michael G. Harbin.



(signature)

Alice J. Forrester
(type/print name)

Walton County, Florida
My Commission Expires: 11/5/2005
Acting in the County of Walton.

